



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

NMA
F.#2011R01798

271 Cadman Plaza East
Brooklyn, New York 11201

January 30, 2012

By ECF

James Froccaro, Esq.
20 Vanderventer Avenue
Suite 103W
Port Washington, New York 11050

Re: United States v. Matthew Rinaldo
Criminal Docket No. 11-783 (CBA)

Dear Mr. Froccaro:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following supplemental discovery with respect to the above-captioned case. Please also consider this letter to be the government's request for reciprocal discovery.

All of the materials described below are available at DupeCoop. You may obtain these materials by contacting John Palermo at (973) 895-1359.

1. Statements of the Defendant

Description	Bates Label
Written statements of the defendant	33-339
Telephone call dated 8/23/11	340
Telephone call dated 8/23/11	341
Telephone call dated 8/23/11	342
Telephone call dated 8/24/11	343
Telephone call dated 8/24/11	344

Description	Bates Label
Telephone call dated 8/24/11	345
Telephone call dated 8/24/11	346
Telephone call dated 8/25/11	347
Telephone call dated 8/26/11	348
Telephone call dated 8/28/11	349
Telephone call dated 8/28/11	350
Telephone call dated 8/29/11	351
Telephone call dated 8/30/11	352
Telephone call dated 8/30/11	353
Telephone call dated 8/30/11	354
Telephone call dated 8/30/11	355
Telephone call dated 8/30/11	356
Telephone call dated 8/30/11	357
Telephone call dated 8/31/11	358
Telephone call dated 9/1/11	359
Telephone call dated 9/1/11	360
Telephone call dated 9/1/11	361
Telephone call dated 9/1/11	362
Telephone call dated 9/1/11	363
Telephone call dated 9/3/11	364
Telephone call dated 10/6/11	365
Consensual recording dated 8/23/11	366
Consensual recording dated 8/30/11	367
Consensual recording dated 9/1/11	368
Consensual recording dated 9/13/11	369
Consensual recording dated 9/23/11	370
Consensual recording dated 10/12/11	371

Description	Bates Label
Consensual recording dated 10/13/11	372

2. Documents and Tangible Items

Description	Bates Label
Surveillance dated 8/23/11	373-376
Photograph of firearm	377
Surveillance and photographs dated 9/1/11	378-386
Surveillance dated 9/9/11	387-389
Surveillance dated 9/13/11	390-393
Surveillance and photographs, dated 10/18/11	394-555
Prior felony conviction dated 6/30/99	556
Prior felony conviction dated 2/13/09	557-560

The government is also in possession of one .357 Magnum Taurus with serial number IG178423, and three rounds of .357 ammunition received by a cooperating witness from the defendant on August 23, 2011. You may call to arrange a mutually convenient time to inspect these items.

If you have further questions or requests, please contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/
Nicole M. Argentieri
Assistant U.S. Attorney
(718) 254-6232

cc: Clerk of Court (CBA) (by ECF)